



ATLANTA REGIONAL COMMISSION

224445

PLANNING • LEADERSHIP • RESULTS

January 28, 2009

Anne K. Quinlan  
Acting Secretary  
Surface Transportation Board  
395 E Street, SW  
Washington DC, 20423-0001

RE: STB Docket No. AB-290 (Sub. No. 210X)

Dear Ms. Quinlan.

This letter concerns the abandonment of the Decatur Street Belt, a 4 3-mile railroad corridor located in northeast Atlanta, Ga., as proposed by the Norfolk Southern Railway Company (NSR) and supported by the Atlanta Regional Commission (ARC).

As the Metropolitan Planning Organization for the 18-county Atlanta area, ARC has been monitoring this situation closely and is concerned that a failure to proceed with the abandonment as proposed will jeopardize the region's ability to fully implement its adopted Regional Transportation Plan. ARC's transportation planning staff has previously commented in favor of the abandonment in letters to NSR and the Surface Transportation Board, and on behalf of ARC's Board of Directors, I am writing to further emphasize the importance of the abandonment to maintaining the integrity and viability of our region's adopted transportation plans.

The Decatur Street Belt is a non-operational freight rail corridor, never used for passenger service, that is now proposed for adaptive re-use as an economic development, light rail transit and multi-use trail project known as the BeltLine. Both the trail and transit components of the BeltLine are included in ARC's adopted RTP, *Envision6*, with an initial phase included in the short-range Transportation Improvement Program. In addition, ARC has also adopted the "Concept 3" plan, developed by the Transit Planning Board (TPB), as the region's guiding document for transit expansion. Concept 3 includes the BeltLine as light rail transit and calls for no other rail service on the Decatur Street Belt.

The abandonment of the Decatur Street Belt as a railroad corridor is a necessary step for its conversion to transit and trail use. To that end, Norfolk Southern submitted its proposal for the abandonment of the corridor to the STB on December 2, 2008. This proposal has been subsequently challenged by the Georgia Department of Transportation (GDOT) and the National Railroad Passenger Corporation (Amtrak), who seek to reactivate the corridor for commuter and intercity rail service, a plan incompatible with the BeltLine proposal, the adopted *Envision6* RTP/TIP, and the regional Concept 3 vision.

ARC would like to stress that the planning processes that led to the development and adoption of both *Envision6* and Concept 3 were highly collaborative efforts in which the participation of regional partners, including GDOT, was actively sought and encouraged. Between August and December of 2008, Concept 3 was officially and independently adopted by both the Transit

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regional partners, including GDOT, was actively sought and encouraged. Between August and December of 2008, Concept 3 was officially and independently adopted by both the Transit Planning Board and ARC. GDOT has voting representation on both organizations, with its chairman serving on the TPB and a board representative serving on ARC's Transportation and Air Quality Committee. Furthermore, Concept 3 was also adopted by the Georgia Regional Transportation Authority, a state-level agency whose members serve at the discretion of the governor. The TPB also includes three direct gubernatorial appointees. At no point during the plan approval processes did any representative of GDOT or the State of Georgia raise an objection regarding the proposed conversion of the Decatur Street Belt to long-term use as a light rail transit and multi-use trail corridor.

As mentioned above, ARC staff has previously commented in favor of the abandonment on two occasions: a letter dated August 21, 2008 supporting NSR's initial proposal for abandonment, and a letter to the STB dated January 16, 2009 responding to the petitions for a stay of the abandonment. These letters provide an overview of how regional and intercity rail needs can be met without use of the Decatur Street Belt, and are attached for your reference. If you have further questions or need additional information, please contact Tom Weyandt, Director of Comprehensive Planning, at (404) 463-3250.

Sincerely,

  
Samuel S. Olen  
Chairman

c: Thomas L. Weyandt, Jr., ARC  
Richard A. Anderson, Georgia Regional Transportation Authority  
Joseph H. Boardman, Amtrak  
Walter M. Deriso, Jr., Georgia Regional Transportation Authority  
Gena L. Evans, Georgia Department of Transportation  
Hon. Shirley Franklin, City of Atlanta  
Kathy Headrick, Norfolk Southern Railway Company  
Bill Kuhlke, Jr., Georgia State Transportation Board  
Terri Montague, Atlanta BeltLine, Inc.  
Beverly A. Scott, Metropolitan Atlanta Rapid Transit Authority  
J. Michael Walls, Metropolitan Atlanta Rapid Transit Authority



ATLANTA REGIONAL COMMISSION

PLANNING • LEADERSHIP • RESULTS

January 16, 2009

Anne K. Quinlan  
Acting Secretary  
Surface Transportation Board  
395 E Street, SW  
Washington DC, 20024

**RE: STB Docket No. AB-290 (Sub. No. 210X)**

Dear Ms. Quinlan:


In August 2008 the Atlanta Regional Commission, the federally-designated metropolitan planning organization for the 18-county Atlanta area, commented in support of the then-proposed abandonment of a 4.3-mile segment of rail line in Atlanta, known as the Decatur Street Belt, by the Norfolk Southern Railway Company (NSR). ARC staff was recently informed that following the filing of the abandonment request by NSR on December 2, 2008, a petition to stay the abandonment was filed by the Georgia Department of Transportation on January 2, 2009 and was subsequently supported in a filing by Amtrak on January 15. This letter is to reiterate ARC's position in favor of the abandonment.

A copy of ARC's original letter of support, dated August 21, 2008 and addressed to Ms. Kathy Headrick at NSR, is attached for your reference. The key points regarding the abandonment included the following:

- The abandonment is critical for the advancement of the transit and multi-use trail components of the BeltLine, a project included in ARC's adopted Regional Transportation Plan with an initial phase included in the short-range Transportation Improvement Program
- Potential future commuter and intercity rail service to Downtown Atlanta would be best achieved with a routing on the combined Norfolk Southern / CSX trunk line on the west side of the city, an active rail corridor serving several major regional destinations
- Several potential sites for a regional passenger rail facility exist on the north side of the city, which would provide long-term support for passenger rail alignments that need not pass through downtown Atlanta (such as that of the existing Amtrak *Crescent*)

ARC staff stands by the positions articulated in the August letter, particularly in light of the recent adoption of Concept 3, the region's official long-range transit vision, which is consistent with the above points and calls for no intercity or commuter rail service on the Decatur Street Belt. If you have further questions or need additional information, please contact David Emory, principal planner for transit planning at ARC, at (404) 463-3283.

Sincerely,

  
Thomas L. Weyandt, Jr.  
Director, Comprehensive Planning



ATLANTA REGIONAL COMMISSION

PLANNING • LEADERSHIP • RESULTS

August 21, 2008

Ms Kathy Headrick  
Coordinator – Abandonments  
Norfolk Southern Corporation  
Strategic Planning Department  
Three Commercial Place  
Norfolk, VA 23510

**RE: Docket No. AB-290 (Sub-No. 21 OX), Norfolk Southern Railway Company  
Abandonment in Atlanta, Fulton County, Georgia**

Dear Ms Headrick:

The staff of the Atlanta Regional Commission (ARC) in is receipt of the letter from Marcellus Kirchner, by way of the Federal Railroad Administration, dated August 1, 2008 and concerning the proposed abandonment of a 4.3-mile segment of rail line in Atlanta, known as the Decatur Street Belt, by the Norfolk Southern Railway Company (NSR). ARC staff has reviewed the abandonment proposal and has concluded that this action will serve the best interests of the Atlanta region with regard to transit expansion and transportation enhancements. Furthermore, ARC would like to use this opportunity to raise several additional issues concerning the corridor in question and the future of rail service in the Atlanta urban core.

As the federally-designated metropolitan planning organization for the 18-county Atlanta region, ARC is responsible for maintaining the long-range Regional Transportation Plan (RTP) and short-range Transportation Improvement Program (TIP). The region's current adopted RTP/TIP, known as Envision6, contains two projects planned for the Decatur Street Belt corridor, both of which are components of the larger Atlanta BeltLine project:

- **AR-450:** Belt Line Transportation Corridor - Multi-Use Path Linking Lindbergh Center to Inman Park to West End to Howell Station to Lindbergh Center
- **AR-451A:** Belt Line Transportation Corridor – Transit Service in the Northeast Quadrant

Given the significant right-of-way constraints along this corridor, the proposed abandonment of the Decatur Street Belt will be critical to the implementation of both the transit and trail projects in the northeast quadrant of the Beltline.

With regard to the specific extents of the proposed abandonment, ARC would also call attention to the importance of connectivity with existing transportation facilities, the MARTA rail system in particular. While the segment's southern endpoint (MP DF 637.40) allows for a seamless connection to the DeKalb Avenue / MARTA East Line corridor, by contrast the northern endpoint (MP DF 633.10) stops nearly one mile short of the Armour Yard area, the point of convergence for the northeast and northwest quadrants of the BeltLine as well as the MARTA North Line. Retaining active rail service on this northernmost section could present challenges to completing the transit and trail connection to the north, particularly given the very limited width of the corridor as it crosses under Interstate 85. As work on the northeast quadrant progresses, ARC encourages the BeltLine project team to work with NSR to ensure that adequate accommodations are provided allowing both the transit and trail components to negotiate the crossing of Interstate 85 and complete the connection to the MARTA North Line and the northwest quadrant of the BeltLine.

ARC is also an active participant in regional discussions concerning additional transit proposals beyond the scope of the current RTP, and is aware of ongoing discussion regarding the possibility of the Decatur Street Belt serving as a downtown approach for commuter or intercity rail. While the issues of downtown access and rail network congestion are legitimate concerns, in this case ARC staff does not believe that they present a sufficient justification for preventing the abandonment of the segment in question. In addition to greatly complicating and possibly precluding implementation of the programmed BeltLine capital projects on this corridor, restoration of FRA-compliant rail activity to the Decatur Street Belt is likely to be a highly contentious issue in the adjacent neighborhoods. Furthermore, ARC staff believes that adequate accommodations for extensive commuter and intercity rail can be provided without utilization of this segment for such purposes.

Regarding passenger rail access to the central city, recent planning efforts have focused on the combined Norfolk Southern / CSX trunk line on the west side of the city, which also serves important regional destinations such as Atlantic Station and Georgia Tech, as the primary northside access route for passenger service into downtown Atlanta. These planning initiatives include the Transit Planning Board's long-range transit vision, Concept 3, which ARC staff fully supports. While this segment is an active rail corridor that is already heavily utilized by freight traffic, several strategies for managing congestion on this segment are of considerable potential and worthy of further study. Such strategies include the creation of regional freight rail bypasses to minimize unnecessary freight routing through the urban core, and the possibility of accommodating trains whose routing need not pass through downtown (such as the existing Amtrak *Crescent*) through the establishment of a secondary multimodal center on the north side of the urban core. (TPB Concept 3 incorporates a recommendation from MARTA for such a facility in the Armour Yard area, and the Lenox and Norcross areas have also been identified as potential locations for intercity rail stations )

In summary, ARC staff has concluded that abandonment of the full Decatur Street Belt is in the best interest of the region's long-term transportation objectives, and that the outstanding questions regarding future passenger rail routing can be addressed through means other than the resumed use of this segment by national rail operators. If you have further questions or need additional information, please contact David Emory, principal planner for transit planning at ARC, at (404) 463-3283

Sincerely,



Thomas L. Weyandt, Jr.  
Director, Comprehensive Planning

TLW:dde

cc: Jane Hayse, ARC  
Heather Alhadeff, City of Atlanta  
Nathan Conable, Atlanta BeltLine Inc.  
Cheryl King, Transit Planning Board  
Donald Williams, MARTA  
Steve Yost, Georgia DOT